## STATE OF ILLINOIS SECRETARY OF STATE SECURITIES DEPARTMENT

IN THE MATTER OF: Jeremiah D. Jacob and Liberty Finance Group, Inc.

FILE NO. 1100231

## NOTICE OF HEARING

TO RESPONDENT:

Jeremiah D. Jacob 1599 Ghent Road

Columbia, Illinois 62236

Liberty Finance Group, Inc.

1599 Ghent Road

Columbia, Illinois 62236

You are hereby notified that pursuant to Section 11.F of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act") and 14 Ill. Adm. Code 130, Subpart K, a public hearing will be held at 69 West Washington Street, Suite 1220, Chicago, Illinois 60602, on the 12th day of September 2013 at the hour of 10:00 a.m. or as soon as possible thereafter, before James L. Kopecky, Esq., or such other duly designated Hearing Officer of the Secretary of State.

Said hearing will be held to determine whether an Order shall be entered which would prohibit Respondents from selling or offering to sell securities in the State of Illinois and/or granting such other relief as may be authorized under the Act including but not limited to the imposition of a monetary fine in the maximum amount pursuant to Section 11.E of the Act, payable within ten (10) business days of the entry of the Order

The grounds for such proposed action are as follows:

- 1. That Respondent Jeremiah D. Jacob (hereinafter "Jacob") is an individual whose last known address is 1599 Ghent Road, Columbia, Illinois 62236.
- 2. That Respondent Liberty Finance Group, Inc. (hereinafter "Liberty Finance") was incorporated in the State Of Illinois on April 14, 2008 and was involuntarily dissolved on September 11, 2009.
- 3. That at all relevant times Jacob was the president of Respondent Liberty Finance. Jacob did business as Liberty Finance.

- 4. That Investor A is an Illinois resident and was so during all relevant times.
- 5. That Jacob in early 2009 solicited Investor A to invest in a gold mine. Investor A invested \$200,000 in March of 2009 and was to receive 15% return on the investment. Jacob further represented that no losses would be incurred on the initial investment and that the funds would be invested in tangible business interests and available for withdrawal after 12 months
- 6. At the time of the offer and sale Jacob did not disclose that he was in default on the contract to purchase the mine.
- Jacob failed to return the \$200,000 despite repeated demands to do so Investor A lost her entire investment of \$200,000.
- 8. That the activities described above constitutes the offer and/or sale of a securities and as those terms are defined in Sections 2.1, 2.5, and 2.5a of the Illinois Securities Law of 1953 [815 ILCS 5] (the "Act").
- 9. That Section 5 of the Act provides, <u>inter alia</u>, that all securities except those exempt under Section 3 or those offered or sold in transactions exempt under Section 4 shall be registered either by coordination or by qualification prior to their offer or sale in the State of Illinois.
- That Respondents failed to file with the Secretary of State an application for registration of the securities described above as required by the Act and that as a result the securities were not registered pursuant to Section 5 of the Act prior to its offer in the State of Illinois.
- 11. That Section 12.A of the Act provides, <u>inter alia</u>, that it shall be a violation for any person to offer or sell any security except in accordance with the provisions of the Act.
- 12. That Section 12 D of the Act provides, inter alia, that it shall be a violation for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of the Act or any rule or regulation made by the Secretary of State pursuant to the Act
- 13. That Section 12 F of the Act provides that it shall be a violation of the Act to engage in any transaction, practice or course of business in connection with the sale or purchase of securities which work or tends to work a fraud or deceit upon the purchaser
- 14. That Pursuant to Section 12.G of the Act, it is a violation of the Act to obtain money or property through the sale of securities by means of any untrue statement of a material fact or any omission to state a material fact

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necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading

15. That by virtue of the foregoing, the Respondents have violated Sections 12.A, 12.D, 12.F and 12.G of the Act.

You are further notified that you are required pursuant to Section 1104 of the Rules to file an answer to the allegations outlined above, a Special Appearance pursuant to Section 1107 of the Rules, or other responsive pleading within thirty (30) days of receipt of this notice. Your failure to do this within the prescribed time shall be deemed an admission of the allegations contained in the Notice of Hearing and waives your right to a hearing.

Furthermore, you may be represented by legal counsel; may present evidence; may cross-examine witnesses and otherwise participate. A failure to appear shall constitute default by you.

The Rules promulgated under the Act and pertaining to Hearings held by the Office of the Secretary of State, Securities Department may be viewed online at http://www.cyberdriveillinois.com/departments/securities/lawrules.html.

Delivery of notice to the designated representative of any Respondent constitutes service upon such Respondent.

Dated: This 之 \_\_\_ day July 201

JESSE WHITE
Secretary of State
State of Illinois

Attorney for the Secretary of State: Gregory J. Solberg 69 West Washington Suite 1220 Chicago, Illinois 60602 (312) 793-9643

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